

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ABDULLAH EZZELDIN TAHA
MOHAMED HASSAN

UNDER SEAL

Case No. 1:23-MJ-498

Defendant.

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Tyler Ellefson, being duly sworn, depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been an FBI Special Agent for approximately three years. In preparation for this assignment, and as part of my continued education, I have successfully completed law enforcement and national security focused training, including formal courses and training exercises. I have already participated in many aspects of federal investigations including, but not limited to, subject and witness interviews, analysis of telephone and financial records, and preparing and executing physical search warrants, digital search warrants, and arrest warrants.

2. As a federal agent, I am authorized to investigate violations of the laws of the United States. As a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for ABDULLAH EZZELDIN TAHA MOHAMED HASSAN (hereinafter referred to as “HASSAN”). Based on my training and experience and the facts as set forth in this affidavit, I submit there is

probable cause to believe that violations of 18 U.S.C. § 842(p)(2)(A) (distribution of information relating to explosives, destructive devices, and weapons of mass destruction in furtherance of the commission of a federal crime of violence, that is 18 U.S.C. §§ 1116(a), 1116(b)(4)(B), 1111 (first-degree murder of internationally protected persons)) have been and are being committed by HASSAN.

4. This affidavit is intended to show only that there is sufficient probable cause for the requested arrest warrant and criminal complaint and does not set forth all of my knowledge about this matter. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from legal process, open-source research, and other agents and witnesses. When I write that an event occurred on a specific date or in a specific month, I mean to convey that the event occurred “on or about” that date or month.

SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE

5. HASSAN is a national of Egypt currently living in Falls Church, Virginia and who is currently in removal proceedings with the U.S. Immigration and Customs Enforcement.

I. HASSAN Operated Several Pro-ISIS and Al Qaeda Accounts that Promoted Violence Against Jews.

A. HASSAN operated X account X ACCOUNT 1.

6. On May 4, 2024, Fairfax County Police Department informed FBI that it had received an anonymous tip regarding an X Corp. (“X”) account user. The user was reportedly based in Virginia. The tipster described the account as engaging in “radical and terrorist-leaning behavior.” The tipster reported the username, which is known to your affiant (hereinafter “X ACCOUNT 1”).

7. Records from X revealed that X ACCOUNT 1 was registered to email address abdullah.et.hassan@[xxxxx].com and phone number (571)-xxx-xxxx (hereinafter “PHONE

NUMBER 1"). X ACCOUNT 1 was created using an identified IP Address (hereinafter "IP ADDRESS 1") on January 1, 2024.

8. Records from Verizon showed that on January 1, 2024, IP ADDRESS 1 was associated with a specific Verizon customer ID subscribed to by HASSAN's father. The land address associated with the same Verizon customer ID is HASSAN's home address in Falls Church, Virginia. IP ADDRESS 1 was assigned to HASSAN's home address in Falls Church, Virginia.

9. In April of 2024, HASSAN reported PHONE NUMBER 1 as his phone number to Immigration and Customs Enforcement.

10. Based on the above, the FBI assesses that HASSAN operates X ACCOUNT 1.

11. A review of the publicly available information associated with X ACCOUNT 1 revealed HASSAN posted the following content:

a. On March 21, 2024, HASSAN made a post about martyrdom and the guarantees of paradise for martyrs. HASSAN stated, "Because all of those martyrs have been guaranteed paradise, this life is a test and we can leave it at any time for the afterlife[.]"

b. On March 27, 2024, while debating other X users, HASSAN made a post emphasizing that he believed that "Islam is a religion of justice, not peace[.]". HASSAN earlier commented, "If your entire family was murdered by someone, would you give them hugs and kisses? Islam is a religion of justice[.]"

c. On April 8, 2024, HASSAN argued with another X user stating, "Hamas are an armed resistance, what terroristic about them? Have you only hear of the conflict since Oct 7th? IDF have been committing war crimes for decades g, it's only time Palestine fight back[.]"

d. On April 9, 2024, HASSAN commented on a post about the Islamic State of Iraq and the Levant ("ISIS") threatening attacks on stadiums hosting the UEFA Champions League quarterfinals, "Praying for an ISIS masterclass uno...[.]"

e. On May 1, 2024, HASSAN made a post revering Osama bin Laden and Ayman Al Zawahiri.¹ He replied to a photo posted of them stating, “Lmao explain how they managed to deal so much damage to the west without being caught/killed for so long, true warriors imo[.]”

f. On May 2, 2024, HASSAN commented on a post about Osama bin Laden’s death by stating, “13 years since my idolo died[.]”²

g. On May 11, 2024, HASSAN made a post indicating possible suicidal ideations by stating, “I may end it all[.]”

h. On May 12, 2024, HASSAN posted, “Allah azwj³ will deal with the American kuffar⁴ army[.]”

i. On May 18, 2024, HASSAN made a comment about murdering people and dumping their bodies in The Thames, a river in England that runs through the City of London. HASSAN stated, “Murder them and hide their bodies in the Thames, who says no?”

j. On May 29, 2024, HASSAN explained his opinion about the Gaza conflict, “The Palestinians do not care for help, they have two options: victory or shahada,⁵ and both are great reward. You will never eliminate them.”

k. On May 31, 2024, HASSAN commented on a photo of a football player by saying the person’s forehead in the picture was a “...sniper’s dream[.]”

B. HASSAN operated another X account (X ACCOUNT 2).

12. On July 24, 2024, the FBI observed a public post from X ACCOUNT 1 that revealed that HASSAN also operated an X account with a known display name (hereinafter “X

¹ Al Zawahiri was the second leader of al-Qaeda between Osama bin Laden’s death in 2011 and Al Zawahiri’s death in 2022. Al Zawahiri is known for his role in planning various terrorist attacks, such as the 1998 U.S. embassy bombings in Kenya and Tanzania, the September 11, 2001, terrorist attacks, and the 2002 Bali bombings.

² In this Affidavit, I have included quotes as they appeared, including grammar, spelling, punctuation errors.

³ In my training and experience, I know that “azwj” is an acronym for an honorific when used next to “Allah.”

⁴ In my training and experience, I know “Kuffar” to be an Arabic word for “nonbelievers” or “infidels.”

⁵ In my training and experience, I know that “shahada” is an Arabic word that means martyrdom in this context.

ACCOUNT 2”). In that public post, HASSAN told another user who was attacking the user of X ACCOUNT 2: “...that’s my other acc btw[.]”

13. Records from X revealed that X ACCOUNT 2 was also subscribed to PHONE NUMBER 1 and created using IP ADDRESS 1.

14. Based on this information and HASSAN’s own statements, the FBI determined that X ACCOUNT 2 was operated by HASSAN.

15. A review of the publicly available information associated with X ACCOUNT 2 revealed HASSAN posted the following content:

- a. On August 2, 2024, HASSAN shared an artificial intelligence’s (“AI”) analysis of his profile. The analysis stated:

Based on our AI agent’s analysis of your tweets, you are a young, radical Islamist extremist who is obsessed with jihad and violence against perceived enemies. Your tweets suggest a deep-seated hatred and intolerance towards those of other faiths, particularly Jews.

HASSAN reposted this post saying, “Alhamduillah,” an Arabic word meaning “praise be to God.”

- b. On August 6, 2024, HASSAN posted, “Yep I am an extremist[.]”

C. HASSAN operated a third X account (X ACCOUNT 3).

16. Records provided by X revealed that between August 27, 2024, and August 28, 2024, HASSAN (using X ACCOUNT 1) engaged in direct message communication with another user. In the message, HASSAN told the other user that he had “an Islamic account that’s rather on the radical side,” and later identified it as a known X account (hereinafter “X ACCOUNT 3”).

17. X records also revealed that on August 27, 2024, X ACCOUNT 1 and X ACCOUNT 3 were both accessed via an IP Address associated with a university campus in Northern Virginia, within the Eastern District of Virginia. On that same day, the FBI observed HASSAN on that university campus.

18. Based on this information, the FBI determined that X ACCOUNT 3 was operated by HASSAN.

19. A review of X ACCOUNT 3 revealed that the account's profile picture depicted Abu Osama al-Masri, the leader of the Islamic State in the Sinai. The "bio" section of X ACCOUNT 3 contained Arabic writing that a public software tool translated as: "now the fight has come."

II. HASSAN Planned a Mass Casualty Attack at the Consulate General of Israel Using an Explosive Device and Rifle.

A. An FBI confidential human source contacted HASSAN.

20. On August 24, 2024, an FBI Confidential Human Source ("CHS-1") located X ACCOUNT 3 and observed a post featuring Ahmad Musa Jibril, an Islamic cleric and convicted felon who has promoted militant Islamism via social media. CHS-1 commented on the post that he⁶ wanted to attend one of Jibril's lectures; HASSAN responded "Ameen."⁷

21. On August 25, 2024, CHS-1 commented to X ACCOUNT 3 that CHS-1 hoped HASSAN did not get suspended and asked if HASSAN had Telegram. HASSAN responded that he did have Telegram and direct messaged CHS-1 with an account name (hereinafter "TELEGRAM ACCOUNT 1") and stated "my tg."

22. Based on a review of publicly available information within Telegram, the FBI identified that PHONE NUMBER 1 was associated with TELEGRAM ACCOUNT 1.

23. On September 1, 2024, CHS-1 identified that X ACCOUNT 3 had been suspended on X and contacted HASSAN through TELEGRAM ACCOUNT 1. On Telegram, HASSAN

⁶ CHS-1 used a male persona to interact with HASSAN, so I will use male pronouns to refer to CHS-1 throughout this affidavit, although CHS-1's actual gender is not necessarily male.

⁷ In my training and experience, I know that "Ameen" means "Amen" in Arabic.

provided CHS-1 a link to HASSAN's Instagram page (hereinafter "INSTAGRAM ACCOUNT 1"), as well as a Telegram Channel of pro-ISIS Nasheeds.⁸

24. On September 2, 2024, the FBI observed that INSTAGRAM ACCOUNT 1's profile picture was the same photograph of Abu Osama al-Masri observed on X ACCOUNT 3.

25. Records provided by Meta Platforms identified that INSTAGRAM ACCOUNT 1 was associated with PHONE NUMBER 1.

26. Based on this information, the FBI determined that INSTAGRAM ACCOUNT 1 was operated by HASSAN.

27. On September 3, 2024, HASSAN, utilizing TELEGRAM ACCOUNT 1, shared ISIS propaganda with CHS-1 and made comments about the growth and strength of ISIS in Afghanistan and West Africa.

28. On October 14, 2024, HASSAN used TELEGRAM ACCOUNT 1 to provide CHS-1 detailed and complex instructions on how to travel to join ISIS using multiple methods of travel.

29. On October 26, 2024, CHS-1 identified that TELEGRAM ACCOUNT 1 had been banned on Telegram. CHS-1 contacted HASSAN via INSTAGRAM ACCOUNT 1. HASSAN introduced CHS-1 to the application SimpleX and provided a username for CHS-1 to contact HASSAN (SIMPLEX ACCOUNT 1).⁹ HASSAN advised that SimpleX was very secure.

⁸ Per open sources, a nasheed is a song without musical instruments, similar to hymns.

⁹ SimpleX is a private and encrypted messaging application.

30. On October 27, 2024, HASSAN sent CHS-1 a video via direct message using INSTAGRAM ACCOUNT 1. CHS-1 observed that the video was ISIS propaganda that invited the listener to jihad.¹⁰

31. After October 27, 2024, HASSAN and CHS-1 communicated on SimpleX with HASSAN using SIMPLEX ACCOUNT 1.

B. HASSAN recruited CHS-1 to conduct a mass casualty attack.

32. On November 15, 2024, HASSAN sent CHS-1 a pro-ISIS video that called for the killing of Jews. CHS-1 responded to this video by pledging allegiance to the leader of ISIS and calling HASSAN his emir.¹¹ CHS-1 told HASSAN that he was waiting on HASSAN's direction.

33. On November 16, 2024, HASSAN reacted to the above messages with heart emojis. That same day, HASSAN deleted the video described in paragraph 32.

34. On November 22, 2024, CHS-1 told HASSAN that if CHS-1 could not travel to join ISIS, it was Allah's will and that "maybe he wants me to act here." HASSAN then responded that CHS-1 should, "...Aim for government buildings, use a Zastava rifle¹² if you can access one to carry out your attack, and All Praises to Allah, the Lord of the Worlds...Or buy a 3d printed gun and just buy ammunition[.]"

¹⁰ In my training and experience, I know that in Arabic "Jihad" means "struggle" and may refer to either an internal struggle or an external struggle, which could involve physical fighting or violence, against the non-believers or enemies of Islam.

¹¹ In my training and experience, I know that in Arabic "emir" means ruler, chief, or commander.

¹² Per open sources, Zastava is a Serbian based firearms manufacturer that produces rifles similar to AK-47s.

C. HASSAN provided CHS-1 instructions on how to prepare a martyrdom video.

35. Following the above, HASSAN provided CHS-1 with directions on making a martyrdom video, including to mask his identity, distort his voice, and record the video with a blank background saying the following:

Your governments have been complicit in and utterly responsible for the deaths of millions of men women and children across al-Sham, Iraq, and our beloved Al Quds. Now has come for revenge. As you weaponize yourselves with your tanks and missiles and jets, we weaponize ourselves with the Wrath of Allah AZWJL upon you. However, you may try to find and kill us, Allah AZWJL will replace our fallen with more muwahidden,¹³ bent on eradicating the corruption that you have brought forth...

D. HASSAN distributed information relating to an explosive device.

36. On November 23, 2024, CHS-1 asked HASSAN to select the target, the date of the attack, and asked HASSAN if he had any bomb-making manuals. HASSAN told CHS-1 that he could find a bomb-making instructions by looking for a specific search term on archive.org and provided CHS-1 advice for bypassing Google's potential censorship of the search results. Eventually, however, HASSAN sent CHS-1 a direct link to the video with the bomb-making instructions. HASSAN suggested that, based on the size of the bomb, CHS-1 should get a backpack to put the bomb in.

37. I have reviewed the bomb-making video described in paragraph 36. In it, a masked male in military-style clothing explains the process to make acetone peroxide, an explosive. Throughout the video, an ISIS flag logo appears in the upper corner. The video is approximately fifteen minutes long and includes English subtitles. The video shows how to make both a detonator

¹³ In my training and experience, “muwahidden” as it appears here is a typo most likely meant to read “mujahideen,” which, in my training and experience, is an Arabic term meaning those who are fighting jihad on behalf of Islam.

and a main explosive. The speaker then shows how to surround the explosive with shrapnel, specifically, ball bearings. After assembly, the speaker says, “we now have a ready bomb.”

38. On November 23, 2024, HASSAN instructed CHS-1 that if CHS-1 conducts the attack, CHS-1 should delete his SimpleX off his phone and save HASSAN’s contacts somewhere else. HASSAN told CHS-1 that HASSAN cannot be caught giving instructions about attack planning because HASSAN believed he was already being watched due to his past.¹⁴

E. HASSAN identified the Consulate General of Israel as the target of the attack.

39. On November 23, 2024, HASSAN messaged CHS-1 that HASSAN believed it would be easier to commit an attack using small arms and be “martyred” by the police (i.e., suicide by cop) than to complete a suicide bombing successfully. In response, CHS-1 told HASSAN that CHS-1 was in New York and that getting a gun in New York was difficult. Upon learning this, HASSAN characterized CHS-1’s location as “a goldmine of targets.” HASSAN stated that the best target for such an attack would be a building that represented the “Yahud.”¹⁵ The next day, HASSAN sent CHS-1 the land address for the Consulate General of Israel.

40. On December 12, 2024, I confirmed with the U.S. Department of State that on any given workday, numerous individuals working at the Consulate General of Israel in New York City would meet the definition of “internationally protected persons” as defined in 18 U.S.C. § 1116(b)(4)(B).

¹⁴ HASSAN was interviewed by the FBI in 2022 as a juvenile due, in part, to HASSAN’s support for ISIS online.

¹⁵ In my training and experience, I know that “Yahud” is an Arabic word for people of the Jewish faith.

F. HASSAN continued to provide operational support to CHS-1 regarding the manufacture and use of an explosive device and the planned attack on the Consulate General of Israel.

41. On November 24, 2024, HASSAN sent CHS-1 two links to purchase 5.45x39mm cartridges and a rifle for the attack. CHS-1 told HASSAN that CHS-1 would learn more about the area of the planned attack. HASSAN responded by asking CHS-1 to keep him updated. CHS-1 asked HASSAN what to look for while conducting surveillance. HASSAN instructed CHS-1 to identify escape routes and ways to sneak in.

42. On November 25, 2024, HASSAN messaged CHS-1 and said that he had spoken with ISIS media producers. HASSAN directed CHS-1 to create a video before committing the attack and provide it to HASSAN, commenting that if CHS-1 is not martyred in the attack, CHS-1 will be famous.

43. On November 25, 2024, CHS-1 told HASSAN that CHS-1 had conducted surveillance on the previously identified attack target and asked what CHS-1 should do now. In response, HASSAN told CHS-1 to “schedule a flight out of the country” and that it should be to “somewhere where there are no extradition laws.” HASSAN further explained CHS-1 should save up money and take weeks to plan the attack.

44. On November 27, 2024, HASSAN told CHS-1 that CHS-1 had two options to conduct the attack. He said CHS-1 could either murder people at the consulate with an assault rifle or detonate an explosive vest while standing in a group of targets. HASSAN specifically stated, “Two options: lay havoc on them with an assault rifle or detonate a TATP¹⁶ vest in the midst of

¹⁶ In my training and experience, TATP is an acronym for Triacetone Triperoxide, an explosive compound. A TATP vest in this context appears to refer to suicide vests historically worn by terrorists to deploy explosives in crowds or buildings.

them...The first option being that similar to Omar Mateen...The second as a regular istishhadi¹⁷ operation[.]”

45. HASSAN then sent CHS-1 the link to a website to buy a rifle and advised CHS-1 to use Bitcoin or other untraceable wallet option to buy the rifle in order to avoid being tracked down by investigators after the attack.

46. On November 28, 2024, HASSAN instructed CHS-1 to livestream the attack using a particular application and to send him a link before carrying out the attack. HASSAN stated that he wanted to record the livestream footage of the operation to distribute it to the ISIS media department.

47. HASSAN then emphasized that the most effective way to conduct the attack was with gunfire, but if CHS-1 was short on money then the only option was to use the bomb manual previously provided. HASSAN stated that the materials to build the bomb would cost less than \$200, and that a bomb ignited in the right place can do a lot of damage.

48. On November 29, 2024, HASSAN asked CHS-1, “...[H]ow far away are u from buying the necessary materials?” CHS-1 told HASSAN that he had most of the materials and was studying timers and better detonation caps. In response, HASSAN replied, “good work[.]”

49. On November 30, 2024, HASSAN instructed CHS-1 to download a particular disposable email application and to use it to send HASSAN the livestream link of the attack.

¹⁷ In my training and experience, I know that “Istihhadi” means the death of a martyr or a heroic death.

G. HASSAN provided CHS-1 instructions on the type of shrapnel to use in the explosive device.

50. On December 3, 2024, HASSAN continued to direct CHS-1 on how to conduct an attack on the General Consulate of Israel in New York, NY and how to escape to a country with no extradition laws with the United States.

51. That same day, HASSAN further advised CHS-1 on how to get out of the country after the attack and escape to a country with no extradition laws. HASSAN suggested CHS-1 travel to Borno rather than Sahel because Sahel is in Burkina Faso, which is harder to get to than Borno. HASSAN emphasized that both are “wilayah of the khilafah,” or provinces of the Islamic State. HASSAN advised CHS-1 to get a plane ticket from New York to Abuja, Nigeria. Then fly from Abuja to Borno. HASSAN estimated it would only cost CHS-1 \$700.

52. On December 4, 2024, CHS-1 asked HASSAN which ball bearings would be the most effective for the bomb; HASSAN stated that 30mm aluminum ball bearings “will do the trick[.]” On December 4, 2024, HASSAN sent CHS-1 a link to a website to purchase ball bearings stating the site was a “DIY,” or do it yourself, website and was unlikely to raise suspicion.

53. HASSAN later changed his mind and instructed CHS-1 to buy 7-9mm ball bearings instead.

CONCLUSION

54. Based on the foregoing, I submit that there is probable cause to believe that between on or about November 22, 2024 to at least on or about December 4, 2024, in Falls Church, Virginia, within the Eastern District of Virginia, HASSAN, violated 18 U.S.C. § 842(p)(2)(A) (distribution of information relating to explosives, destructive devices, and weapons of mass destruction in furtherance of the commission of a federal crime of violence, that is 18 U.S.C. §§ 1116(a), 1116(b)(4)(B), 1111 (first-degree murder of internationally protected persons)).

Respectfully submitted,

Tyler Ellefson

Tyler Ellefson
Special Agent
Federal Bureau of Investigation

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on December 16, 2023.

William E. Fitzpatrick

The Honorable William E. Fitzpatrick
UNITED STATES MAGISTRATE JUDGE

Alexandria, Virginia